

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO: 1:20-CR-228
	:	
Plaintiff,	:	
	:	JUDGE BENITA Y. PEARSON
-vs-	:	
	:	<b><u>DEFENDANT NORRIS'S</u></b>
WAYNE NORRIS,	:	<b><u>SENTENCING MEMORANDUM</u></b>
	:	
Defendant.	:	

Defendant Wayne Norris, through counsel, respectfully submits the Sentencing Memorandum to support his request for a sentence that is sufficient but not greater than necessary to achieve the statutory goals of sentencing under to Title 18, United States Code §§ 3553(a) and 3661.

Respectfully submitted,

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Ohio Bar: 0051928

/s/ Darin Thompson  
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## **MEMORANDUM**

### **I. Introduction**

On March 19, 2020, Wayne Norris was indicted on a single count of possession with the intent to distribute cocaine, in violation of 18 U.S.C. §841(a)(1) and (b)(1)(B). (R. 3). On April 29, 2020, Mr. Norris filed a Notice of Intent to Plea with Proposed Plea Agreement. (R. 16).

A Presentence Investigation Report (“PSR”) was prepared and calculates Mr. Norris’s guideline range at 57-71 months, with a Total Offense Level of 21 and a Criminal History Category IV, subject to any mandatory term. (R. 31: PSR, ¶ 67). Mr. Norris has no objections to the guidelines range set out in the PSR, and respectfully requests this Court impose a sentence that is sufficient but not greater than necessary to achieve the goals of sentencing.

### **II. A sentence that is sufficient but not greater than necessary.**

Mr. Norris asks this Court to consider his health and traumatizing personal history when determining a sentence that is sufficient but not greater than necessary. *See* 18 U.S.C. § 3553(a). These facts are set forth in detail in the Sealed Supplement to this Sentencing memorandum.

When Mr. Norris was 14 he was kicked out of his house, and was homeless for about a year before he moved in with the girl who would become his first wife. They had two children. After they separated, he entered into another relationship, and fathered two more children. He remains close with all his children and their mothers.

In 2015, at the age of 27, he was sentenced to prison for the first time, five years for drug trafficking and related offenses. When he was released, he and his fiancé Desiree Hoinowski moved in together, and he began trying to rebuild his life. He began reconnecting with his children from both his prior marriage and the relationship thereafter. He was active in their lives. He took them to school and to doctor’s appointments. He helped them with school work. He went parent-teacher conference, award assemblies, and school events with them. (See letters in support,

attached as Exhibit A). He and his fiancé had planned to open a restaurant. It was the financial pressure from this attempted entrepreneurial endeavor that led to him engaging in the criminal conduct in the instant case.

Mr. Norris profoundly regrets his decision to engage in drug trafficking in an effort to alleviate the financial pressure he and his family faced. He had begun building a life for them, but now his decision has left it in ruins. The relationships he built with his children will be torn apart again. When he completes the sentence this Court imposes, he will begin building again, understanding that there can be no “quick fix” for financial troubles, and assisted by his supportive and loving family.

For the foregoing reasons, Mr. Norris requests a sentence that is “sufficient but not greater than necessary” to achieve the statutory purposes of punishment, as required by 18 U.S.C. § 3553(a).

Respectfully submitted,

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